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19 LAWYERS TITLE OF NEVADA, INC.

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21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 BANK OF AMERICA, N.A.,

28 Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00349-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT, REMAND MOTION,
AND FEES MTION (ECF NOS. 1, 6,
AND 7)**

FIRST REQUEST

COMES NOW defendant Lawyers Title of Nevada, Inc. ("Lawyers Agency"), defendant Fidelity National Title Insurance Company ("FNTIC"), defendant Fidelity National Title Group, Inc. ("FNTG") and plaintiff Bank of America, N.A. ("Bank of America") (collectively, the "Parties"), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1 1. On March 1, 2021 Bank of America filed its complaint in the Eighth Judicial
2 District Court for the State of Nevada;

3 2. On March 1, 2021, FNTIC removed the instant case to the United States District
4 Court for the State of Nevada (ECF No. 1);

5 3. Lawyers Agency's response to Bank of America's complaint is currently due on
6 April 12, 2021;

7 4. FNTIC's response to Bank of America's complaint is currently due on April 15,
8 2021;

9 5. Bank of America filed a motion to remand and a motion for fees (ECF Nos. 6 and
10 7);

11 6. Lawyers Agency's, FNTIC's, and FNTG's (collectively, "Defendants") deadline to
12 respond to the motion to remand and the motion for fees is currently April 14, 2021;

13 7. The Parties are in the process of formalizing a stipulation to stay this case pending
14 the appeal in *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Ninth Cir. Case No. 19-
15 17332 (District Court Case No. 3:19-cv-00241-MMD-WGC);

16 8. Defendants request a two-week extension of these deadlines to afford the Parties
17 additional time to formalize their stipulation to stay this case;

18 9. Counsel for Bank of America does not oppose the requested extension;

19 10. This is the first request for an extension made by FNTIC and Lawyers Title, which
20 is made in good faith and not for the purposes of delay.

21 11. This stipulation is entered into without waiving any of FNTIC's or Lawyers Title's
22 objections under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Lawyers Title's deadline to respond to the complaint is
2 hereby extended through and including Monday, April 26, 2021, Defendants' deadline to respond
3 to the motion to remand and the motion for fees (ECF Nos. 6 and 7) for fees is hereby extended
4 through and including Wednesday, April 28, 2021, and FNTIC's deadline to respond to the
5 complaint is hereby extended through and including Thursday, April 29, 2021.

6 Dated: April 12, 2021

SINCLAIR BRAUN LLP

8 By: /s/-Kevin S. Sinclair
9 KEVIN S. SINCLAIR
10 Attorneys for Defendants
11 LAWYERS TITLE OF NEVADA, INC.

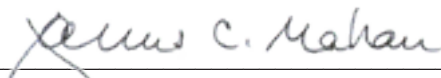
12 Dated: April 12, 2021

WRIGHT FINLAY & ZAK, LLP

13 By: /s/-Darren T. Brenner
14 DARREN T. BRENNER
15 Attorneys for Plaintiff
16 BANK OF AMERICA, N.A.

17 **IT IS SO ORDERED.**

18 Dated April 14, 2021.

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20 JAMES C. MAHAN
21 UNITED STATES DISTRICT JUDGE
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